

VLADECK, RASKIN & CLARK, P.C.

ANNE C. VLADECK
212-403-7327
EMAIL: avladeck@vladeck.com

July 12, 2017

By ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

Re: Lataillade v. LVMH Moet Hennessy-Louis Vuitton SE, et al.
Case No. 16-cv-06637(PAE)

Dear Judge Engelmayer:

We write on behalf of plaintiff Patrice Lataillade ("Lataillade" or "plaintiff") respectfully to request leave to respond to the letter dated July 10, 2017 of LVMH Moet Hennessy-Louis Vuitton SE ("LVMH SE" or "defendant") (ECF Doc. 70) opposing Lataillade's letter motion to compel dated July 5, 2017 (ECF Doc. 68). In his July 5 motion to compel, plaintiff anticipated the need to file an additional submission to address LVMH SE's unspecified objections based on foreign laws. (See ECF Doc. 68 at 1). Plaintiff therefore requested permission for that filing. (*Id.*). Moreover, defendant's July 10 letter includes numerous misrepresentations, as well as information that LVMH SE never previously discussed with plaintiff despite Lataillade's repeated requests to do so. Because such conduct may make a fair resolution of these matters particularly difficult, plaintiff respectfully requests that the Court permit plaintiff to respond to LVMH SE's letter, and that the Court convene a conference where the issues can be fully discussed.

Respectfully submitted,


Anne C. Vladeck

ACV/avk

cc: All counsel of record (via ECF)

